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June 20, 2005

Mr. Lewis T. De Board III  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Re: Nashville Safety Valve Block Review

Docket 05-00159

Dear Mr. De Board,

As part of the investigation of AT&T numbering resources in the Nashville rate center, six thousands-blocks were identified as having less than 500 numbers assigned to customers, thus potentially viable for use in the present "safety valve" request. AT&T has investigated the telephone number detail on each of these 6,000 numbers. The data is attached in an Excel spreadsheet.

Analysis of the thousands-blocks shows several assignments made before the first Federal Communications Commission ("FCC") Numbering Resource Optimization order (CC Docket No. 99-200) was effective. Using an effective date of July 17, 2000 as a sorting threshold reveals most of the hundreds-block were already populated with assigned numbers before the requirement to use Sequential Number Assignment was ordered by the FCC.

The spreadsheet presents the telephone number ("TN"), current numbering status ("TN Status"), date the number was assignment ("Date Assigned") and disconnected ("Date Disconnected") on six separate worksheets, one for each thousands-block reviewed. Based on the data, AT&T suggests that the contamination of these blocks, while rendering them insufficient for the specific customer need, was begun prior to rules that should have preserved assignment options in this case. Consequently, AT&T requests the TRA continue towards a grant of authority for acquisition of a block our customer requires.

Please contact me at 816-436-9090 if you have any questions.

Sincerely,

  
Mark Lancaster  
AT&T 